

BUTZEL LONG, a professional corporation
150 West Jefferson, Suite 100
Detroit, MI 48226
(313) 225-7000
Cynthia J. Haffey
Chester E. Kasiborski, Jr.

Attorneys for Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)	
)	Chapter 11
DPH HOLDINGS CORP., <i>et al.</i>)	
)	Case No. 05-44481 (RDD)
)	Jointly Administered
Reorganized Debtors.)	

**JOINT STIPULATION AND AGREED ORDER BETWEEN REORGANIZED
DEBTORS AND ACCURATE THREADED FASTENERS, INC. f/k/a ATF, INC.
DISALLOWING AND EXPUNGING ADMINISTRATIVE
EXPENSE CLAIM NUMBERS 18524, 18717 AND 19952**

(ACCURATE THREADED FASTENERS, INC. f/k/a ATF, INC.)

DPH Holdings Corp. and its affiliated reorganized debtors in the above-captioned cases (collectively, the “Reorganized Debtors”) and Accurate Threaded Fasteners, Inc. f/k/a ATF, Inc. (the “Claimant”) submit this Joint Stipulation and Agreed Order Between Reorganized Debtors and Accurate Threaded Fasteners, Inc. f/k/a ATF, Inc. Disallowing and Expunging Administrative Expense Claim Numbers 18524, 18717 and 19952 (the “Joint Stipulation and Agreed Order”) and state as follows:

WHEREAS, on October 8 and 14, 2005, Delphi Corporation ("Delphi") and certain of its affiliates, former debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), predecessors of the Reorganized Debtors, filed voluntary petitions in this Court for reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1330, as then amended.

WHEREAS, on or about July 13, 2009 Claimant filed an administrative expense claim in the amount of \$252,529.50 ("Claim 18524") which alleged the entitlement to payment for goods supplied to the Debtors from September 22, 2005 through December 8, 2005.

WHEREAS, on or about July 14, 2009 Claimant filed an administrative expense claim in the amount of \$123,033.67 ("Claim 18717") which alleged the entitlement to payment for goods supplied to the Debtors after the filing of the voluntary petitions and prior to June 1, 2009.

WHEREAS, on October 6, 2009, the Debtors substantially consummated the First Amended Joint Plan Of Reorganization Of Delphi Corporation And Certain Affiliates, Debtors And Debtors-In-Possession, As Modified (the "Modified Plan"), which had been approved by the United States Bankruptcy Court for the Southern District of New York pursuant to an order entered on July 30, 2009 (Docket No. 18707), and emerged from chapter 11 as the Reorganized Debtors.

WHEREAS, on or about November 5, 2009 Claimant filed an administrative expense claim in the amount of \$65,009.47 ("Claim 19952") which alleged the entitlement to payment for goods supplied to the Debtors between June 1, 2009 and October 5, 2009.

WHEREAS, on January 22, 2010, the Reorganized Debtors objected to Claim 18524, Claim 18717 and Claim 19952 (collectively the "Claims") pursuant to the Reorganized Debtors' Forty-Third Omnibus Objection Pursuant To 11 U.S.C. § 503(b) And Fed. R. Bankr. P. 3007 To

(I) Expunge Certain Administrative Expense (A) Severance Claims, (B) Books And Records Claims, (C) Duplicate Claims, (D) Equity Interests, (E) Prepetition Claims, (F) Insufficiently Documented Claims, (G) Pension, Benefit, And OPEB Claims, (H) Workers' Compensation Claims, And (I) Transferred Workers' Compensation Claims, (II) Modify And Allow Certain Administrative Expense Severance Claims, And (III) Allow Certain Administrative Expense Severance Claims (“Forty-Third Omnibus Objection”) (Docket No. 19356).

WHEREAS, on February 18, 2010 Claimant filed its Response of Accurate Threaded Fastener’s Inc. to the Reorganized Debtors’ Forty-Third Omnibus Objection (“Claimant’s Response”) (Docket No. 19500). In Claimant’s Response, Claim 18524 was reduced from \$252,529.50 to \$217,184.47, Claim 18717 was reduced from \$123,033.62 to \$117,891.27, and Claim 19952 was reduced from \$65,009.47 to \$2,873.16.

WHEREAS, the Reorganized Debtors have represented that there are no pending actions against the Claimant under Chapter 5 of the Bankruptcy Code.

WHEREAS, to resolve the Forty-Third Omnibus Objection and Claimant’s Response with respect to the Claims the parties have agreed that the Claims should be disallowed and expunged in their entirety.

NOW, THEREFORE, the Reorganized Debtors and the Claimant stipulate and agree as follows:

1. Claimant’s Response is hereby deemed withdrawn with prejudice.
2. Claim 18524, Claim 18717, and Claim 19952 are hereby disallowed and expunged in their entirety.
3. Nothing herein shall be construed as an admission of liability on behalf of Debtors or Reorganized Debtors.

4. This Court shall retain original and exclusive jurisdiction to adjudicate any disputes arising from or in connection with this Stipulation.

So Ordered in White Plains, New York
this 12th day of October, 2011.

/s/Robert D. Drain
United States Bankruptcy Judge

AGREED TO AND APPROVED FOR ENTRY:

BUTZEL LONG, a professional corporation

REED SMITH LLP

By: /s/ Chester E. Kasiborski, Jr

By: /s/ Ann E. Pille

Cynthia J. Haffey
Chester E. Kasiborski, Jr.
150 West Jefferson, Suite 100
Detroit, MI 48226
Ph.: (313) 225-7000
Fax: (313) 225-7080
e-Mail haffey@butzel.com
kasiborski@butzel.com

Stephen T. Bobo (IL No. 6182054)
Ann E. Pille (IL No. 6283759)
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, Illinois 60606
Ph: (312) 207-1000
Fax: (312) 207-6400
e-Mail: sbobo@reedsmith.com
apille@reedsmith.com

*Attorneys for DPH Holdings Corp., et al
Reorganized Debtors*

*Counsel to Accurate Threaded Fasteners, Inc.
f/k/a ATF, Inc.*